

ONONDAGA LAKE

NYD986913580

OU: 00

8.0 GENERAL ENFORCEMENT

8.1.2 PRP Specific Info and Correspondence

Lockheed Martin Corporation

No. 1

0000026077



ADDITIONAL DOCUMENTATION  
FOR THIS PRP CAN BE  
FOUND IN THE FOLLOWING  
8.1.2 PRP FOLDER(S):

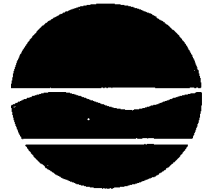
---

*Martin Marietta Corporation*

---

New York State Department of Environmental Conservation  
Division of Environmental Enforcement  
Room 410A  
50 Wolf Road  
Albany, New York 12233-5550

Telephone: (518) 457-7821  
Fax: (518) 457-7819



Michael Zagata

Commissioner

June 18, 1996

Virginia Robbins, Esq.  
Bond, Schoeneck & King  
One Lincoln Center  
Syracuse, New York 13202-1355

Re: Lockheed Martin: Electronics Park facility

Dear Ms. Robbins:

This correspondence acknowledges our conversation during the meeting on June 6, 1996, at the Syracuse Metropolitan Development Association's offices in Syracuse. We had been discussing the contaminants of concern (PCBs, cadmium, copper and mercury) analyzed by sampling conducted on May 31, 1996, in the West and Middle Branches of Bloody Brook both on and downstream of Lockheed Martin's Electronics Park property. In that discussion, I indicated that the on-going negotiations for the RCRA corrective measures consent order can incorporate these contaminants within the remedial program for the site. Lockheed Martin agreed and committed to incorporate the contaminants identified by the Department in its remedial program for the facility under that order.

During the meeting, the Department's RCRA regulatory staff indicated that, with such incorporation into the corrective measures order, these contaminants would be considered new solid waste management units or areas of concern. Under these circumstances, the parties intend that issues arising under the ECL Article 27, Title 13 and CERCLA be addressed by the RCRA order; thus, it will not be necessary to contemplate whether this facility would be a sub-site in the Onondaga Lake NPL Site, the RCRA consent order having established a comprehensive remedial program for the contaminants of concern. As you know, DEC staff and Lockheed Martin personnel are in the process of determining how the contaminants of concern should be identified and their possible sources traced, for purposes of incorporating them into the remedial process being established under the RCRA order negotiations. It is our understanding that Lockheed will remain committed to accomplishing this within the context of that order.

This does not constitute a representation regarding the Electronics Park facility with respect to off-site Lake NPL site claims or Natural Resource Damages claims. Please let me know if this presents any questions. Thank you very much.

Sincerely yours,

Wm G. Little

cc: Dan Palm, DEC, Region 7  
David Mankiewicz, Syracuse MDA

bc: George Shanahan  
Herb King ✓  
Stephen Hammond  
Bill Daigle  
Leland Flocke  
Charlie Branagh  
Ilsa Gruber  
Bill Wertz  
Tim DiGiulio

LOCKHEED MARTIN



April 16, 1996

**By Overnight Delivery**

William L. Daigle, P.E.  
Project Manager  
New York State Department of  
Environmental Conservation  
50 Wolf Road  
Albany, New York 12233-7010

Re: Joint Request for Information Concerning  
Onondaga Lake, Syracuse, New York

INSERTED

Dear Mr. Daigle:

Enclosed please find a copy of two documents marked "Attachment A" and "Attachment B," which were inadvertently omitted from Item 3 of Exhibit E attached to Lockheed Martin Corporation's (LMC) April 10, 1996 letter. This letter responded to the March 11, 1996 supplemental joint request for information from the New York State Department of Environmental Conservation and the U.S. Environmental Protection Agency made pursuant to Section 104(e) of the Comprehensive Environmental Response, Compensation, and Liability Act and the New York Environmental Conservation Law.

Attachment A is a memorandum, dated June 17, 1993, to Heather Daniels from Richard Price regarding the EP-10 electrical substation; Attachment B is a memorandum, dated June 17, 1993, to Heather Daniels from Richard Price regarding the former railroad track area sampling program.

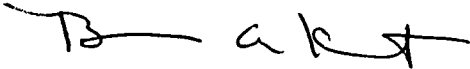
Exhibit E to LMC's April 10, 1996 letter is a white binder; Item 3 is referenced on the index to Exhibit E as "Letter to Heather Daniels of Martin Marietta Corporation, dated June 18, 1993, Re: Sampling Results-Former Railroad Track Area and EP-10 Substation."

Please add the enclosed documents behind the document in Item 3 of Exhibit E attached to LMC's April 10, 1996 letter.

William L. Daigle, P.E.  
April 16, 1996  
Page 2

If you have any question, please call me at 315-456-6976.

Sincerely,

A handwritten signature in black ink, appearing to read "B A Kent", with a horizontal line extending to the left and a small flourish at the end.

Brian A. Kent, Manager  
Environment, Safety & Health

Enclosures

cc: Mr. Herbert H. King (w/ enclosures)  
George A Shanahan (w/o enclosures)  
William G. Little, Esq. (w/o enclosures)

Exhibit A

EXHIBIT A

TRANSFORMERS AT ELECTRONICS PARK

BUILDING TRANSFORMERS

Transformer I.D.	Location	Year Removed From Service, Transported Offsite for Disposal, or Disposed
1-21A	EP-1 Basement	1988
1-21B	EP-1 Basement	1988
2-21	EP-2 Basement	1990
2-22	EP-2 Basement	1987
3-21A	EP-3 Basement	1987
3-21B	EP-3 Basement	1985
3-21C	EP-3 Basement	1986
4-21	EP-4 Basement	1985
5-1A	EP-5 Roof Penthouse	1990
5-1B	EP-5 Roof Penthouse	1984
5-2A	EP-5 Outdoor Penthouse	1990
5-5A	EP-5 Roof Penthouse	1990
5-5B	EP-5 Roof Penthouse	1984
5-7A	EP-5 Roof Penthouse	1984
5-8A	EP-5 Roof Penthouse	1990
5-8B	EP-5 Roof Penthouse	1985
5-21	EP-5 Basement	1990
6-1A	EP-6 Roof Penthouse	1988
6-1B	EP-6 Roof Penthouse	1988
6-2A	EP-6 Roof Penthouse	1988



Transformer I.D.	Location	Year Removed From Service, Transported Offsite for Disposal, or Disposed
6-2B	EP-6 Roof Penthouse	1988
6-3A	EP-6 Roof Penthouse	1988
6-3B	EP-6 Roof Penthouse	1988
6-5A	EP-6 Roof Penthouse	1988
6-8A	EP-6 Roof Penthouse	1988
6-8B	EP-6 Roof Penthouse	1988
6-8C	EP-6 Roof Penthouse	1988
6-21	EP-6 Basement	1988
6-22A	EP-6 Compressor Building	1988
6-22B	EP-6 Compressor Building	1988
6-23A	EP-6 Compressor Building	1988
6-23B	EP-6 Compressor Building	1988
7-1A	EP-7 Roof Penthouse	1989
7-1B	EP-7 Roof Penthouse	1989
7-2A	EP-7 Roof Penthouse	1989
7-2B	EP-7 Roof Penthouse	1989
7-2C	EP-7 Roof Penthouse	1988
7-5A	EP-7 Roof Penthouse	1989
7-5B	EP-7 Roof Penthouse	1989
7-6A	EP-7 Roof Penthouse	1989
7-21	EP-7 Basement	1989
7-22A	EP-7 Basement	1988
7-22B	EP-7 Basement	1988
7-23A	EP-7 Basement	1989

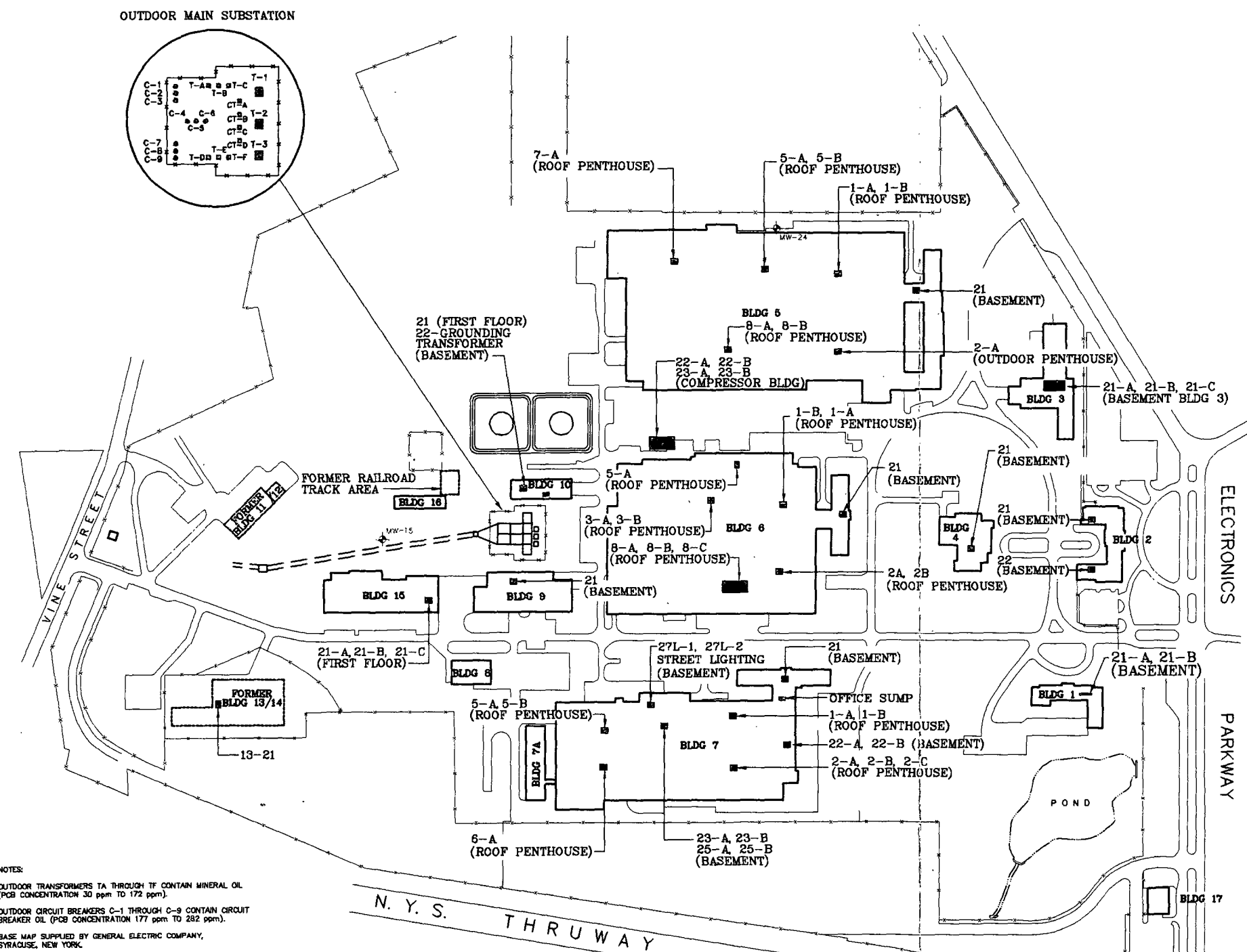
Transformer I.D.	Location	Year Removed From Service, Transported Offsite for Disposal, or Disposed
7-23B	EP-7 Basement	1989
7-25A	EP-7 Basement	1989
7-25B	EP-7 Basement	1989
7-27L-1	EP-7 Basement (street lighting)	1990
7-27L-2	EP-7 Basement (street lighting)	1990
9-21	EP-9 Basement	1987
10-21	EP-10 First Floor	1985
10-22	EP-10 Basement	1984
13-21	EP-13 Basement	1989
15-21A	EP-15 First Floor	1988
15-21B	EP-15 First Floor	1988
15-21C	EP-15 First Floor	1988

# MAIN ELECTRICAL SUBSTATION TRANSFORMERS AND CIRCUIT BREAKERS

Transformer I.D.	Status
T-A	In Service
T-B	In Service
T-C	In Service
T-D	In Service
T-E	In Service
T-F	In Service
CT-A	In Service
CT-B	In Service
CT-C	In Service
CT-D	In Service
T-1	In Service
T-2	Out of Service Effective 6/95 - Currently in Place as Standby
T-3	In Service

Circuit Breaker I.D.	Status
R5	In Service
R80	In Service
R140	In Service

Exhibit B



NOTES:

OUTDOOR TRANSFORMERS TA THROUGH TF CONTAIN MINERAL OIL  
PCB CONCENTRATION 30 ppm TO 172 ppm).

OUTDOOR CIRCUIT BREAKERS C-1 THROUGH C-9 CONTAIN CIRCUIT  
BREAKER OIL PCB CONCENTRATION 177 ppm TO 282 ppm).

BASE MAP SUPPLIED BY GENERAL ELECTRIC COMPANY,  
SYRACUSE, NEW YORK

FOR PURPOSES OF CLARITY ONLY MONITORING WELLS MW-15 AND  
MW-24 ARE SHOWN. A COMPLETE MONITORING WELL NETWORK  
EXISTS ON-SITE.

X (XREF)  
L: (LAYER)  
P: DL  
4/96 SYR-54-YCC  
38074002/38074G01.DWG

PLANT NORTH

TRUE NORTH

### LEGEND

- FENCE

PCB CONTAINING  
TRANSFORMER LOCATION

FORMER PCB CONTAINING  
TRANSFORMER LOCATION

BASEMENT SUMP

GROUNDWATER MONITORING  
WELL

LOCKHEED MARTIN CORPORATION  
SYRACUSE, NEW YORK  
ELECTRONICS PARK

## SITE PLAN

**BBL** BLASLAND, BOUCK & LEE, INC.  
engineers & scientists

FIGURE  
1

Exhibit C







Exhibit D



**EXHIBIT D**  
**LOCKHEED MARTIN CORPORATION**  
**PCB ANALYTICAL DATA**

Doc. #	Location	Title	Generated By	Received By	Date	Comments
1	Bloody Brook	Bloody Brook Water/Sediment Sampling	Upstate	LMC	03/14/96	PCBs not detected in Bloody Brook water, solid, sludge, soil at the north boundary of EP.
2	All EP	Phase III Ground-Water Investigation Interim Report	BBL	NYSDEC	1/93	PCBs not detected in ground water at select monitoring wells.
3	All EP	Supp. Phase III Ground-Water Investigation Report	BBL	NYSDEC	10/93	PCBs not detected in ground water at MW-19.
4	All EP	Phase III Ground-Water Investigation Report	BBL	NYSDEC	4/93	PCBs (Aroclor 1242 and Aroclor 1260) detected in ground water at MW-15.
5	Electrical Manhole System	Request to Discharge Power Distribution System Water	MMC	OCDDS	03/29/94	PCBs (Aroclors 1242, 1248 and 1254) detected in water from electrical manhole system.
6	Electrical Manhole System	Request to Discharge Power Distribution System Water	MMC	OCDDS	04/05/94	PCBs (Aroclor 1248) detected in filtered water but not detected in 2 tankers of water from power distribution system.
7	Electrical Manhole System	Request to Discharge Power Distribution System Water	MMC	OCDDS	04/03/94	PCBs not detected in 1 tanker of water from power distribution system.
8	Electrical Manhole System	Daily Electrical Manhole Treatment System Sampling	Upstate	MMC	06/20/94	PCBs (Aroclor 1254) detected in water from electrical manhole system.
9	EP-1, 2, 4, 5, 7, 9, 10	Ongoing Remediation	Upstate	LMC/BBL	1996	PCBs (Aroclors 1242, 1248, 1254 and 1260) detected at several former transformer locations, HVAC area, compressor area.
10	EP-3	EP-3 Elevator Sampling	Upstate	GE	04/04/91	PCBs (Aroclor 1242) detected in oil from EP-3 elevator.
11	EP-5	EP-5 Shaker Table Oil Analysis	Upstate	GE	07/12/90	PCBs not detected in oil from EP-5 shaker table.
12	EP-5	EP-5 Elevator Sampling	Upstate	GE	04/04/91	PCBs not detected in oil from EP-5 elevator.
13	EP-5	EP-5 Equipment Sampling	Op-Tech	MMC	04/13/94	PCBs (Aroclor 1260) detected on surface of unspecified motor and on unspecified surface.
14	EP-5	EP-5 Equipment Sampling	BBL	MMC	11/18/94	PCBs (Aroclor 1254) detected on surfaces of EP-5 equipment.
15	EP-5	Former TPO Area Ground-Water Investigation	BBL	LMC	1/96	PCBs (Aroclor 1260) detected in soil from excavation and unfiltered ground water from MW-24.
16	EP-6	Summary of Building Cleaning Activities	BBL	MMC	04/19/93	PCBs (Aroclor not available) detected in solid sample from EP-6 sump; PCBs not detected on other surfaces at EP-6.
17	EP-6	EP-6 Transformer Oil Sampling	Upstate	GE	11/26/90	PCBs not detected in oil from Transformers 6-1B and 6-2A.
18	EP-6	EP-6 Elevator Sampling	BBL	GE	06/12/91	PCBs (Aroclor not available) detected in oil from EP-6 elevator.
19	EP-6	PCB Sampling Program - Concrete & Flooring, Hydraulic Oil	BBL	BBL	10/21/93	PCBs (Aroclors 1242 and 1254) detected in flooring cores and hydraulic oil from EP-6.
20	EP-6	PCB Sampling Program - Penthouse #6	BBL	BBL	12/03/93 <sup>1</sup>	PCBs (Aroclor 1254) detected in flooring cores from Substation 6-8.
21	EP-6	PCB Sampling Program - Substation 6-1A & 1B	BBL	BBL	12/03/93	PCBs (Aroclor not available) detected in flooring cores from Substations 6-1A and 6-1B.
22	EP-6	PCB Sampling Program - Compressor Building	BBL	BBL	12/03/93	PCBs (Aroclors 1242, 1254 and 1260) detected in flooring cores from the Compressor Building.
23	EP-6	EP-6 Roof Tank Analytical	Upstate	MMC	06/09/94	PCBs not detected on surfaces of roof equipment tank.
24	EP-6	PCB Remediation Project Building EP-6	BBL	MMC	6/94	PCBs (Aroclors 1242, 1254, 1248 and 1260) detected in cores, surfaces at former transformer locations/dock levelers.
25	EP-6, EP-7	Summary Report PCB Sampling and Remedial Activities	BBL	GE	2/93	PCBs (Aroclors 1248, 1254 and 1260) detected in core samples and on surfaces from EP-6 elevators and EP-7 basement.
26	EP-7	EP-7 Sump Analysis	Upstate	GE	10/26/89	PCBs (Aroclor 1260) detected in oil from EP-7 sump.
27	EP-7	EP-7 Sump Analysis	Upstate	GE	11/10/89	PCBs (Aroclor 1260) detected in oil from EP-7 sump.
28	EP-7	EP-7 Transformer Pad Wipe Sampling	GE	GE	03/01/91	PCBs (Aroclor 1260) detected on surfaces at unspecified EP-7 transformer pad.
29	EP-7	EP-7 Office Sump Sampling	Upstate	GE	03/15/91	PCBs (Aroclor 1260) detected in oil and water from office sump.
30	EP-7	EP-7-2 Elevator Sampling	Upstate	GE	04/04/91	PCBs not detected in oil from Elevator 7-2.
31	EP-7	Surface and Air PCB Analytical	Galson	GE	10/21/91	PCBs not detected in air; PCBs (Aroclor not available) detected on surfaces of transformers 7-22A/22B.
32	EP-7	Surface Wipe Sample Results	OBG	MMC	10/15/93	PCBs (Aroclors 1248 and 1260) detected on surfaces of equipment.
33	EP-7	Model Shop Equipment Sampling	Upstate	MMC	11/03/93	PCBs (Aroclors 1242, 1254, and 1260) detected on surfaces of PDPO equipment.
34	EP-7	EP-7 Compressor Sampling	Op-Tech	MMC	01/04/94	PCBs (Aroclor 1260) detected on surfaces of compressor.
35	EP-7	PDPO Machine Shop Data Package	BBL	MMC	01/10/94	PCBs (Aroclors 1242, 1254, and 1260) detected on surfaces of PDPO equipment.
36	EP-7	PDPO Equipment Sampling	BBL	LMC	10/04/95	PCBs (Aroclors 1254 and 1260) detected on surfaces of PDPO equipment.
37	EP-7	Model Shop Grinder Sampling	Op-Tech	MMC	02/04/94	PCBs not detected in wipe samples from unspecified hydraulic reservoir, drip pan, and ceramic pit.

**EXHIBIT D**  
**LOCKHEED MARTIN CORPORATION**  
**PCB ANALYTICAL DATA**

Doc. #	Location	Title	Generated By	Received By	Date	Comments
38	EP-7	PCB Air Monitoring	Galson	GE	9/91	PCBs not detected in air of EP-7 basement.
39	EP-7A	TSDF Closure Tank Sampling	Upstate	C&S Engineers	05/15/91	PCBs not detected in solid and soil from EP-7 tank area.
40	EP-7A	General Electric Company EP-7A Tank Removal Project	C&S Engineers	GE	02/19/92	PCBs (Aroclors 1254, 1242 and 1260) detected in water and sludge from Tank 7.
41	EP-7A	EP-7A Haz. Waste Storage Facility Site Closure Activities	C&S Engineers	NYSDEC	7/92	PCBs (Aroclor 1260) detected in concrete at nonflammable storage room.
42	EP-7A	Tank Removal Project Analytical Summary	GE	GE	No Date	PCBs (Aroclors 1242, 1254, and 1260) detected in water and sediment from Tanks 3 and 7.
43	EP-7, EP-8, EP-15	PDPO Machine Shop Analytical Summary Table	BBL	BBL	10/06/93	PCBs (Aroclors 1248, 1254 and 1260 ) detected on surfaces of PDPO machine shop, trailer, and EP-8 equipment.
44	EP-8	EP-8 Load Lifter Sampling	Galson	GE	12/07/92	PCBs (Aroclor 1254 and 1260) in wipe samples of EP-8 load lifter.
45	EP-8	Building EP-8 Equipment Monitoring Program	BBL	MMC	04/23/93	PCBs (Aroclor not available) detected in oil and on surfaces of EP-8 equipment.
46	EP-9	EP-9 Elevator Sampling	Upstate	GE	04/04/91	PCBs (Aroclor 1242) detected in oil from EP-9 elevator.
47	EP-10	EP-10 Floor Drain Sampling	BBL	MMC	04/13/94	PCBs (Aroclors 1254 and 1260) detected in water from the EP-10 floor/foundation drain system.
48	EP-10	EP-10 Pump Sampling	Op-Tech	MMC	06/27/94	PCBs (Aroclor 1260) detected in unspecified pump, associated piping, and surfaces in EP-10.
49	EP-10	EP-10 Basement Air Compressor Sampling	BBL	LMC	10/04/95	PCBs not detected in oil from EP-10 basement air compressor.
50	EP-10	EP-10 Joy Air Compressor Sampling	BBL	LMC	10/19/95	PCBs not detected in oil from EP-10 Joy air compressor.
51	EP-10	EP-10 Compressor Pit Sampling	Upstate	MMC	11/07/95	PCBs (Aroclor 1254) detected in water at EP-10 Compressor Pit.
52	EP-10	Boiler #1 Burner Combustion Efficiency Testing	Galson	GE	8/85	PCBs not detected in waste solvent from Boiler #1.
53	EP-10	Engineering Design Report Carbon Treatment System	BBL	NYSDEC	9/94	PCBs (Aroclors 1254 and 1260) detected in water from EP-10 floor/foundation drain system.
54	EP-10 Substation	EP-10 Substation and Vicinity Sampling	BBL	MMC	1993	PCBs (Aroclor 1260) detected in soil and on surfaces in and around Main Electrical Substation (Exhibit E).
55	EP-10 Substation	OCB/Transformer Oil Analytical	Upstate	GE	05/22/90	PCBs (Aroclor 1260) detected in OCB and transformer oil from Main Electrical Substation.
56	EP-10 Substation	Current and Potential Transformer Sampling	Niagara Mohawk	GE	09/20/90	PCBs (Aroclor not available) detected in oil from potential and current transformers from Main Electrical Substation.
57	EP-10 Substation	Transformer T-2 Oil Analytical	GE	GE	04/28/92	PCBs (Aroclor 1260) detected in OCB and transformer oil from Main Electrical Substation.
58	EP-10 Substation	Sampling Results-Former RR Track Area & EP-10 Substation	BBL	MMC	06/18/93	PCBs (Aroclors 1242, 1254 and 1260) detected in soil, concrete at Main Electrical Substation; in soil at Former RR Track Area.
59	EP-10 Substation	EP-10 Substation Soil Pile Analysis	Op-Tech	MMC	09/15/93	PCB not detected in soil at EP-10 Substation soil pile.
60	EP-10 Substation	EP-10 Substation Verification Sampling	BBL	MMC	10/14/93	PCBs not detected in soil and on surfaces at transformers T-1 and T-2.
61	EP-10 Substation	EP-10 Substation PCB Remediation Project Summary	BBL	MMC	01/10/94	PCBs (Aroclor 1260) detected in soil and on surfaces at Main Electrical Substation.
62	EP-10 Substation	Transformer/OCB Oil Analyses	GE	GE	1988-94	PCBs (Aroclor not available) detected in oil from OCBs and transformers at Main Electrical Substation.
63	EP-10 Substation	PCB Sampling and Analysis Plan	BBL	MMC	5/93	PCBs (Aroclor 1260) detected in oil from potential transformers and an OCB from Main Electrical Substation.
64	EP-11/EP-12 area	Supp. West EP Ground-Water Investigation Report	BBL	NYSDEC	9/94	PCBs not detected in ground water at Compost & Debris Area or in ground water at bedrock.
65	Unspecified	Unspecified Oil Analytical	Galson	GE	02/27/86	PCBs (Aroclor 1260) detected in oil at unspecified location.
66	Unspecified	Transformer Oil Analysis	Upstate	GE	05/22/90	PCBs (Aroclor 1260) detected in oil from unspecified transformer.
67	Unspecified	Unspecified Oil Analytical	Upstate	GE	04/08/91	PCBs (Aroclor 1242) detected in oil and solid at unspecified location.
68	Unspecified	Compressor Oil Sample Analytical	Upstate	GE	09/08/92	PCBs (Aroclor 1254) detected in oil at unspecified location.
69	Unspecified	Unspecified Water and Sludge Analytical	Upstate	GE	10/13/92	PCBs not detected in sump sludge and sump water at unspecified location.
70	Unspecified	Equipment Sampling	Upstate	MMC	12/06/93	PCBs (Aroclors 1254 and 1260) detected on surfaces of unspecified equipment.
71	Unspecified	Equipment Sampling	Op-Tech	MMC	04/21/94	PCBs (Aroclor 1260) detected on surfaces of unspecified equipment.

New York State Department of Environmental Conservation  
Division of Environmental Enforcement  
Room 410A  
50 Wolf Road  
Albany, New York 12233-5550

Telephone: (518) 457-7821  
Fax: (518) 457-7819



Michael Zagata  
Commissioner

March 12, 1996

Brian A. Kent  
Environmental Manager  
Lockheed-Martin  
Syracuse Operations Department  
P.O.Box 4840  
Syracuse, New York 13221-4840

Re: Joint DEC-EPA letter inquiry

Dear Mr. Kent:

This is to confirm our conversation yesterday, after our meeting with the Syracuse Metropolitan Development Authority and DEC's Regional and Central Office staff. The return addresses supplied for the EPA personnel identified in the supplemental joint DEC-EPA letter inquiry handed to you at the outset of our meeting are incorrect. The correct addresses are as follows:

Herbert H. King  
Remedial Project Manager  
USEPA  
290 Broadway  
20th Floor  
New York, New York 10007-1866

George A. Shanahan  
Assistant Regional Counsel  
USEPA  
290 Broadway  
17th Floor  
New York, New York 10007-1866

My apologies for any inconvenience caused by this error. Thank you.

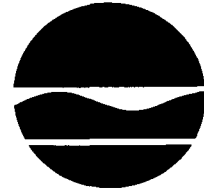
Sincerely yours,

*/s/*  
Wm. G. Little  
Associate Attorney  
Division of Environmental  
Enforcement

cc: George Shanahan  
Herb King

New York State Department of Environmental Conservation  
Division of Environmental Enforcement  
Room 410A  
50 Wolf Road  
Albany, New York 12233-5550

Telephone: (518) 457-7821  
Fax: (518) 457-7819



Michael Zagata  
Commissioner

March 11, 1996

Brian A. Kent  
Environmental Manager  
Lockheed-Martin  
Syracuse Operations Department  
P.O.Box 4840  
Syracuse, New York 13221-4840

re: Joint DEC-EPA letter inquiry

Dear Mr. Kent:

The Department of Environmental Conservation and the Environmental Protection Agency have reviewed the responses your company has submitted to our joint letter of inquiry and follow-up inquiries. This letter is to request supplemental information pursuant to CERCLA 104(e) and ECL Articles 3, 17, 19, 27, 37, 40 and 71 concerning matters that have recently come to our attention which we believe to have been within the ambit of, but were not addressed with specificity in, our earlier inquiries.

While our review of your most recent submittal (November 27, 1995) continues, additional information relating to the presence of PCBs and certain metals at or in the vicinity of the Electronics Park facility is requested, as set forth below. In regard to any analytical data which may have already been submitted to the Department, please provide the date of the submission and the name of the person to whom the information was sent. We will then make a diligent attempt to locate that information. If we are unable through diligent efforts to locate the information, we will then request that you provide it to the Department. Your response to this request for information should be postmarked or received by DEC or EPA within thirty (30) days of your receipt of this letter. Your response should be mailed to:

William Daigle, P.E.  
Project Manager  
NYSDEC  
50 Wolf Road  
Albany, New York 12233-7010

(518) 457-1741

with a copy to :

Herbert H. King  
Remedial Project Manager  
USEPA  
26 Federal Plaza, Room 29-102  
New York, New York 10278

Copies of the transmittal letter (without any enclosures or attachments) should also be mailed to:

George A. Shanahan, Esq.  
Assistant Regional Counsel  
USEPA  
26 Federal Plaza, Room 437  
New York, New York 10278

and

William G. Little, Esq.  
NYSDEC  
Division of Environmental Enforcement  
Room 410A  
50 Wolf Road  
Albany, New York 12233-5550  
(518) 457-7821

If you have any questions concerning this information request, please contact Mr. Daigle (technical issues) or Mr. Little (legal issues and all communications from an attorney).

- 1) Please provide a listing and description of all areas where PCBs have been used or stored at the Electronics Park facility. This should include the electrical substation, as well as any other areas where transformers, capacitors, or other potential PCB sources or materials are, or have been, used or stored at the facility. In addition, please indicate if PCBs have ever been used in hydraulic systems or heat transfer systems at the facility. As part of the response to this question, describe any potential sources which might be responsible for the detection of PCBs in water samples collected from MW-15, MW-24, and Building 10's floor/foundation drain system, as well as in samples of biota and water (as discussed below) collected from Bloody Brook.
- 2) For the period of time prior to the implementation of the January 1982 "Exposure and Contamination Control Plan (ECCP) PCBs", please describe the manner in which

PCBs were handled at the facility during their use, transport, storage or disposal. This should include any draining or filling of transformer oils or dielectric fluids.

- 3) Please provide a brief description of the various source(s) for all of the PCB wastes that have been sent for off-site disposal. For instance, the response should identify specifically where, at the facility, and how the wastes were generated.
- 4) Please provide any analytical data in your company's possession relating to the potential presence of PCBs in environmental media, facility utilities, or other manmade structures on, or in the immediate vicinity of, the facility. This should include any sampling which was performed at or in the vicinity of the electrical substation area. Please note that manmade structures refer to any structures other than that equipment in which PCBs or PCB containing-fluids might have been used (e.g. transformers, capacitors, light ballasts).
- 5) Please indicate if PCBs or PCB-containing fluids have ever been spilled or otherwise released to the environment at or in the vicinity of the facility. If so, please describe the incident(s) and any steps taken to characterize the affected area or to clean up or otherwise remedy the contamination.
- 6) Regarding the elevated levels of mercury, copper and cadmium in biota collected from Bloody Brook, as discussed below, do you have any information in addition to that which has already been provided, which might assist us in our evaluation of this data?

This additional, more focused information request is primarily in response to analytical results of water quality and macroinvertebrate monitoring which was conducted by NYSDEC at various Bloody Brook locations, adjacent to and downstream of the Electronics Park facility. This data indicates that the facility may be linked to certain off-site, adverse impacts related to PCB contamination as well as certain metals. Following are general discussions of the sampling techniques and results for your information.

The invertebrate samples were collected by the Stream Biomonitoring Unit of the Department's Division of Water and were analyzed by the Wadsworth Center of the New York State Department of Health. The analytical data and a map showing the sampling

stations are provided as an attachment to this letter. Please note that the PCB aroclor 1260 results for Station 6 were originally reported as <2700 micrograms per kilogram (mcg/kg). The results should have been reported as 2700 mcg/kg. A revised laboratory report is also provided as an attachment to this letter.

Passive In-Situ Chemical Extraction Samplers (PISCES) were placed, by Department staff, in all of the major tributaries to Onondaga Lake. The purpose of the work was to monitor for the presence of PCBs. The analytical results indicated that the Bloody Brook sampler (placed at Old Liverpool Road) collected approximately 419 to 653 nanograms of PCBs during its nearly two week deployment in the brook. These values were in the top three of all of the analyzed samples and are indicative of a PCB source or sources upstream of the sample location.

Sincerely yours,

William G. Little, Esq.  
NYSDEC  
Division of Environmental  
Enforcement

George A. Shanahan, Esq.  
USEPA  
Assistant Regional Counsel

cc: Virginia Robbins, Esq.

bc: Commissioner Zagata  
George Shanahan, USEPA Reg. 2  
Bill Little, DEE  
Herb King, USEPA Reg. 2  
Bill Daigle, DHWR  
Don Hesler, DHWR  
Bill Wertz, DOW



**LOCKHEED MARTIN** 

March 1, 1996

**BY OVERNIGHT COURIER**

George A. Shanahan, Esq.  
Assistant Regional Counsel  
New York/Caribbean Superfund Branch  
United States Environmental Protection Agency  
Region II  
290 Broadway  
New York, New York 10007-1866

Re: Information Request Concerning Former GE Court Street 5/5A Site

Dear Mr. Shanahan:

This is in response to your February 13, 1996 letter sent to Lockheed Martin Corporation's ("Lockheed Martin") outside counsel, Virginia Robbins, requesting a copy of documents Martin Marietta Corporation submitted to the New York State Department of Environmental Conservation ("NYSDEC") on October 27, 1995 with respect to the removal of soil adjacent to a transformer pad located at the former GE Court Street 5/5A site ("site") in March 1995. This soil removal was prompted by the analysis of a composite soil sample collected near the drain outlets in a transformer pad located west of Building 5A which indicated PCBs at 27.4 parts per million. The sample had been collected in connection with a Phase II Environmental Site Assessment ("ESA") performed by C & H Engineers for a potential buyer of the property. To the best of Lockheed Martin's knowledge, the analytical data referenced in the C & H Engineers' Phase II ESA have never been validated. As part of the soil removal project, Martin Marietta collected three confirmatory soil samples from the excavation area and one sample of the excavated soil. No PCBs were detected in any of these four samples.

As you requested, we have enclosed a copy of the documents submitted to NYSDEC on October 27, 1995. We also provide additional comments on your request as follows.

1. **NYSDEC as lead agency.** The enclosed documents were submitted to NYSDEC in response to a request by NYSDEC Attorney Robert Davies, which request was confirmed in his October 23, 1995 letter. Your name was listed on the October 23 letter as having received a copy of the letter.

George A. Shanahan, Esq.

March 1, 1996

Page 2

Although the October 23 letter was not a joint NYSDEC/EPA information request, we understand, through discussions with Mr. Davies, that with respect to CERCLA §104(e) information requests concerning Onondaga Lake, NYSDEC is acting as lead agency. We had therefore concluded that NYSDEC would share with EPA any information we provide on the referenced site which is relevant to the CERCLA §104(e) process. Please advise if our understanding of this administrative process is not correct.

For your file, please note that, on January 28, 1996, Martin Marietta merged into its parent corporation, Lockheed Martin Corporation. Lockheed Martin is the successor by merger to Martin Marietta.

**2. Obligation to Supplement CERCLA §104 (e) Response.** EPA states in its February 13, 1996 letter that Martin Marietta has taken the position that the enclosed documents are not responsive to the NYSDEC/EPA CERCLA §104(e) initial and supplemental Requests for Information concerning Onondaga Lake. We must respectfully disagree with that statement. As stated in the October 27, 1995 submittal to NYSDEC, the documents relating to the soil removal at the site had not been provided in response to the CERCLA §104(e) Requests for Information, dated July 1994 (as supplemented in December 1994), because they were not in existence at the time Martin Marietta submitted its September 23, 1994 and January 6, 1995 responses.

Although Attorney Davies contends that there is an ongoing obligation to supplement CERCLA §104(e) responses, we have not found a provision in CERCLA §104(e) that imposes that obligation. Nevertheless, we submitted to NYSDEC and now to your office, the enclosed information, because we agree that both NYSDEC and EPA retain the right to request additional information.

**3. Status of Soil Removal Project.** As indicated above, PCBs were not detected in the three confirmatory soil samples collected from the excavation area (adjacent to Building 5A transformer pad) or from one sample of the excavated soil that was disposed off site. NYSDEC has completed its review and evaluation of the enclosed documents which give the background on this project. In the context of defining the scope of the remedial investigation to be performed pursuant to a pending Consent Order, Lockheed Martin agreed to submit the post-excavation confirmatory sampling results for PCBs to a data validator for validation. Lockheed Martin recently received the data validation report, which indicates the post-excavation confirmatory sampling results are unqualified. The data validation report was submitted to NYSDEC on February 27, 1996. Upon NYSDEC's acceptance of the data validation report, no further sampling will be required in the Building 5A transformer pad area. However, soil sampling in the vicinity of another transformer pad area at the site (located on the northwest side of Building 5) will be undertaken as part of the proposed remedial investigation.

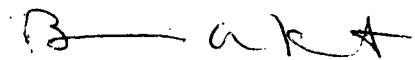
George A. Shanahan, Esq.  
March 1, 1996  
Page 3

4. **Status of Site Remediation Projects.** As you know, since submitting its responses to the initial and supplemental NYSDEC/EPA CERCLA §104(e) Requests for Information, Lockheed Martin has begun negotiating the terms of a Consent Order with NYSDEC to address affected groundwater at the site. Also, Lockheed Martin has made substantial progress on remediating the following three sites referenced in previous responses: Court Street B, Electronics Park, and Farrell Road.

At Court Street B, Lockheed Martin has installed and operated, in accordance with an air permit issued by NYSDEC, a soil vapor extraction system to address volatile organic compound contamination in soils. At Electronics Park, Lockheed Martin is finalizing a Corrective Measures Implementation Plan (CMIP) to address site-wide groundwater contamination, and will enter into a Corrective Action Consent Order with NYSDEC for implementation of the CMIP. At the Farrell Road site, Lockheed Martin is implementing interim remedial measures, in three areas of concern, and has submitted to NYSDEC a Feasibility Study to address remediation of site-wide groundwater and final remedy selection for area of concern soils. Please let me know if you would like further information regarding these remediation efforts.

If you have any questions with respect to any of the foregoing matters, please call me at 315-456-6976.

Sincerely,



Brian A. Kent, Manager  
Environment, Safety & Health

Enclosure

cc (without enclosure): Robert K. Davies, Esq.  
William L. Daigle, P.E.  
Sandra Lee Fenske, Esq.  
Virginia C. Robbins, Esq.

Exhibit C

**BUCK ENVIRONMENTAL  
LABORATORIES INC.**3845 ROUTE 11 SOUTH,  
CORTLAND, N.Y. 13045P.O. BOX 5150  
607-753-3403**TOXICITY CHARACTERISTICS LEACHING PROCEDURE**  
**METALS**

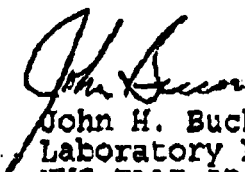
Client: LAIDLAW ENVIRONMENTAL SERVICES N.E.	Report Date: 03/14/95 Date Received: 03/08/95 Sampled By: M. DelMonte Extraction: TCLP 1311 Percent Solids: 82.0% Lab Log No: 9503099
Site: Martin Marietta Court Street	
Sample: Roll Off - Solids	

Cas No.	Compound	Regulatory Level (mg/L)	Result (mg/L)
7440-39-2	Arsenic	5.0	ND (<.100)
7440-39-3	Barium	100.0	.330
7440-43-9	Cadmium	1.0	ND (<.050)
7440-47-3	Chromium	5.0	ND (<.050)
7440-50-8	Copper	-	ND (<.050)
7439-92-1	Lead	5.0	ND (<.100)
7439-97-6	Mercury	0.2	.0048
7440-02-0	Nickel	-	ND (<.050)
7782-49-2	Selenium	1.0	ND (<.100)
7440-22-4	Silver	5.0	ND (<.100)
7440-28-0	Thallium	-	ND (<.100)
7440-66-6	Zinc	-	ND (<.050)

Fluid Extraction Method: Fluid #1

ND - None detected greater than detection limits noted.

These analyses are certified as conforming to generally accepted laboratory practices and requirements of the New York State Health Department ELAP program.

  
John H. Buck, P.E.  
Laboratory Director  
NYS ELAP ID. 10795

**BUCK ENVIRONMENTAL  
LABORATORIES, INC.**3845 ROUTE 11 SOUTH  
CORTLAND, N.Y. 13045P.O. BOX 5150  
807-753-3403**TOXICITY CHARACTERISTICS LEACHING PROCEDURE**  
**VOLATILE COMPOUNDS**

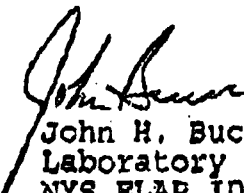
Client: LAIDLAW ENVIRONMENTAL SERVICES N.E. Report Date: 03/14/95  
Date Received: 03/08/95  
Sampled By: M. DelMonte  
Site: Martin Marietta Extraction: TCLP 1311  
Court Street Percent Solids: 82.0%  
Sample: Roll Off - Solids Lab Log No: 9503099

Cas No.	Compound	Regulatory Level (mg/L)	Result (mg/L)
71-43-2	Benzene	0.5	ND (<.005)
56-23-5	Carbon Tetrachloride	0.5	ND (<.005)
108-90-7	Chlorobenzene	100.0	ND (<.005)
67-66-3	Chloroform	6.0	ND (<.005)
106-46-7	1,4-Dichlorobenzene	7.5	ND (<.005)
107-06-2	1,2-Dichloroethane	0.5	ND (<.005)
75-35-4	1,1-Dichloroethylene	0.7	ND (<.005)
78-93-3	Methyl Ethyl Ketone	200.0	ND (<.100)
127-18-4	Tetrachloroethylene	0.7	ND (<.005)
79-01-6	Trichloroethylene	0.5	ND (<.005)
75-01-4	Vinyl Chloride	0.2	ND (<.010)

ND - None detected greater than detection limits noted.

Fluid Extraction Method: Fluid #1

These analyses are certified as conforming to generally accepted laboratory practices and requirements of the New York State Health Department ELAP program.

  
John H. Buck, P.E.  
Laboratory Director  
NYS ELAP ID 10795

**BUCK ENVIRONMENTAL**  
**LABORATORIES INC.**3845 ROUTE 11 SOUTH,  
CORTLAND, N.Y. 13045P.O. BOX 5150  
607-753-3403

Report Date: 03/10/95

Lab Log Number: 9503099

**LABORATORY REPORT**

Client: LAIDLAW ENVIRONMENTAL SERVICES  
4545 Morgan Place  
Liverpool, NY 13090

Site: Martin Marietta, Court St.

Sample Description: Solids

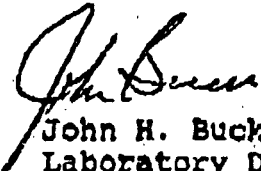
Date of Sample: 03/07/95 by Matt DelMonte

**PCB (by EPA 3540 and 8080)**  
**RESULTS**

Roll Off - Solids	ND (<0.1 ug/g)
Sludge	76.0 ug/g as received (613 ug/g dry weight basis)

ND - None detected greater than detection limit stated.

These analyses are certified as conforming to generally  
accepted laboratory practices and requirements of the New  
York State Health Department ELAP program.

  
John H. Buck, P.E.  
Laboratory Director  
NYS ELAP CERT 10795

**BUCK ENVIRONMENTAL  
LABORATORIES INC.**3545 ROUTE 11 SOUTH,  
CORTLAND, N.Y. 13045P.O. BOX 5150  
807-753-3403**TOXICITY CHARACTERISTICS LEACHING PROCEDURE**  
**VOLATILE COMPOUNDS**

Client: LAIDLAW ENVIRONMENTAL SERVICES N.E.	Report Date: 03/14/95
	Date Received: 03/08/95
	Sampled By: M. DelMonte
Site: Martin Marietta Court Street	Extraction: TCLP 1311
Sample: Sludge	Percent Solids: 12.4%
	Lab Log No: 9503099

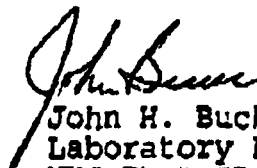
Cas No.	Compound	Regulatory Level (mg/L)	Result (mg/L)
71-43-2	Benzene	0.5	ND (<.500)
56-23-5	Carbon Tetrachloride	0.5	ND (<.500)
108-90-7	Chlorobenzene	100.0	ND (<.500)
67-66-3	Chloroform	6.0	ND (<.500)
106-46-7	1,4-Dichlorobenzene	7.5	ND (<.500)
107-06-2	1,2-Dichloroethane	0.5	ND (<.500)
75-35-4	1,1-Dichloroethylene	0.7	ND (<.500)
78-93-3	Methyl Ethyl Ketone	200.0	ND (<10.0)
127-18-4	Tetrachloroethylene	0.7	ND (<.500)
79-01-6	Trichloroethylene	0.5	.791
75-01-4	Vinyl Chloride	0.2	ND (<1.00)

ND - None detected greater than detection limits noted.

Fluid Extraction Method: Fluid #1

Detection limits raised due to sample matrix.

These analyses are certified as conforming to generally accepted laboratory practices and requirements of the New York State Health Department ELAP program.

  
John H. Buck, P.E.  
Laboratory Director  
NYS ELAP ID 10795



**BUCK ENVIRONMENTAL  
LABORATORIES INC.**3845 ROUTE 11 SOUTH  
CORTLAND, N.Y. 13045P.O. BOX 5150  
607-753-9409**TOXICITY CHARACTERISTICS LEACHING PROCEDURE**  
**VOLATILE COMPOUNDS**

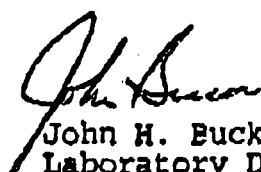
Client: LAIDLAW ENVIRONMENTAL SERVICES N.E. Report Date: 03/14/95  
Date Received: 03/08/95  
Sampled By: M. DelMonte  
Site: Martin Marietta Court Street Extraction: TCLP 1311  
Sample: Liquid Percent Solids: <.5%  
Lab Log No: 9503099

Cas No.	Compound	Regulatory Level (mg/L)	Result (mg/L)
71-43-2	Benzene	0.5	ND (<.050)
56-23-5	Carbon Tetrachloride	0.5	ND (<.050)
108-90-7	Chlorobenzene	100.0	ND (<.050)
67-66-3	Chloroform	6.0	ND (<.050)
106-46-7	1,4-Dichlorobenzene	7.5	ND (<.050)
107-06-2	1,2-Dichloroethane	0.5	ND (<.050)
75-35-4	1,1-Dichloroethylene	0.7	ND (<.050)
78-93-3	Methyl Ethyl Ketone	200.0	ND (<1.00)
127-18-4	Tetrachloroethylene	0.7	ND (<.050)
79-01-6	Trichloroethylene	0.5	ND (<.050)
75-01-4	Vinyl Chloride	0.2	ND (<.100)

ND - None detected greater than detection limits noted.

No extraction needed as solid are <.5%.

These analyses are certified as conforming to generally accepted laboratory practices and requirements of the New York State Health Department ELAP program.

  
John H. Buck, P.E.  
Laboratory Director  
NYS ELAP ID 10795

**BUCK ENVIRONMENTAL**  
**LABORATORIES INC.**3846 ROUTE 11 SOUTH  
CORTLAND, N.Y. 13045P.O. BOX 5150  
007-753-3403

Report Date: 03/10/95

Lab Log Number: 9503099

---

**LABORATORY REPORT**

---

Client: LAIDLAW ENVIRONMENTAL SERVICES  
4545 Morgan Place  
Liverpool, NY 13090

Site: Martin Marietta, Court St.

Sample Description: Liquid

Date of Sample: 03/07/95 by Matt DelMonte

---

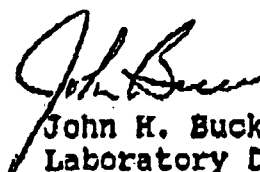
PCB (by EPA 3510 and 6080)  
RESULTS

Liquid

45.5 ug/l

---

These analyses are certified as conforming to generally  
accepted laboratory practices and requirements of the New  
York State Health Department ELAP program.

  
John H. Buck, P.E.  
Laboratory Director  
NYS ELAP CERT 10795

**LOCKHEED MARTIN** 

October 27, 1995

**OVERNIGHT DELIVERY**

William Daigle, P.E.  
Project Manager  
New York State Department of  
Environmental Conservation  
50 Wolf Road  
Albany, New York 12233-7010

Re: Former GE Court Street 5/5A Plant

Dear Mr. Daigle:

This is in response to the request that Martin Marietta Corporation's ("MMC") outside counsel, Virginia Robbins, received from Attorney Robert Davies of the New York State Department of Environmental Conservation (DEC) on October 20, 1995 for information related to a soil removal project adjacent to a transformer pad at Building 5A. This request was confirmed by Mr. Davies in his October 23, 1995 letter to Attorney Robbins.

The soil removal project was unrelated to any of the historical review conducted by MMC in response to the EPA/DEC Request for Information under CERCLA § 104(e). It involved work performed in response to a Phase II Environmental Assessment report prepared by a consultant for a potential buyer of the Court Street Building 5A property.

As requested, we have attached copies of the documents listed below relating to the studies conducted by parties other than MMC and the soil removal project which was undertaken by MMC in March 1995. We have also included information related to a second project prompted by the Phase II Environmental Assessment which involved the cleaning of an interior floor drain sump and associated floor drains in Building 5A.

- ✓ Exhibit A: Phase I Environmental Assessment Report dated December 19, 1994, prepared for Mr. Wayne Hicks of Marine Midland Bank and WJW Associates by C & H Engineers, P.C. (Phase I Report);
- ✓ Exhibit B: Letter report dated February 2, 1995, from C&H Engineers, P.C. to Mr. Wayne Hicks of Marine Midland Bank, regarding Phase II Environmental Assessment services at the Building 5A property (Phase II Report);
- ✓ Exhibit C: Six analytical reports, two dated March 10, 1995 and four dated March 14, 1995, prepared by Buck Environmental Laboratories, Inc., relating to the sediment and water transported off-site for disposal;
- Exhibit D: Hazardous waste manifest dated March 21, 1995, relating to the transportation and off-site disposal of sediment and water;
- ✓ Exhibit E: Document entitled "PCB Remediation Project" dated March 21, 1995 from Action Technical Services, Inc. to MMC, which includes a summary of field activities relating to both projects, scope of work provided to potential contractors in late February, 1995 for bidding purposes,<sup>1</sup> floor plan showing sample locations, laboratory data, confined space entry permits and pre-entry checklists; and
- Exhibit F: Drawing dated January 4, 1971 indicating floor drain sump and floor drains discharging to sanitary sewer.

MMC has correspondence in its files to and from the prior owner of the Building 5A property relating to the soil removal and sump cleaning and certain contractual issues relating to the termination of the lease at Building 5A. We have not provided copies of this correspondence because the information it contains regarding conditions at the property is also contained in the documents attached to this letter. Also, MMC has in its files (1) a memorandum dated March 27, 1995, acknowledging a Bill of Lading relating to the transportation and off-site disposal of excavated soil as nonregulated waste, and (2)

---

<sup>1</sup> The scope of work was modified to delete the plugging of floor drains (See item 5 in scope of work).

William Daigle, P.E.

October 27, 1995

Page 3

confirmation regarding the incineration of wastes generated from the work. Please let us know if you would like copies of these documents.

As you know, the General Electric Company Aerospace business (GE) leased Buildings 5 and 5A from DE & JD Associates (DE & JD), but had ceased operations at these buildings by December 31, 1991. In April 1993, MMC assumed the lease for these properties in connection with the transfer of the GE Aerospace business to MMC. MMC never conducted any operations, other than remedial activities, at either of these buildings, and terminated the lease on December 30, 1993. Under the lease termination agreement, DE & JD released MMC from all obligations arising from the condition of the properties, except for the remediation of the conditions identified in the March 1993 Remedial Action Plan and October 1993 addendum prepared by Wehran-New York, Inc.

The Phase I Report (Exhibit A) and the Phase II Report (Exhibit B) are addressed to Mr. Wayne Hicks of Marine Midland Bank, suggesting that C&H Engineers' environmental assessment services were performed in connection with a potential buyer's financing of the purchase of the property. MMC had no involvement in the environmental assessment services performed by C&H Engineers and did not independently verify the accuracy of the information or analytical data referenced in and attached to the Phase I and Phase II Reports.

The Phase II Report identified two areas on the Building 5A property where PCBs had been detected: soils adjacent to the transformer pad and sediment in a floor drain sump. According to the Phase II Report, analysis of a composite soil sample collected from the area adjacent to the transformer pad contained PCBs at 27.4 parts per million (ppm). In addition, analysis of a sample of sediment collected from an existing interior floor drain sump contained 45.5 ppm PCBs. Notwithstanding the contract between MMC and DE & JD, in response to a request by DE & JD made after the Phase II Report was issued, MMC agreed to address the two areas of concern to ensure that all remedial work at Building 5A was performed properly and in compliance with regulatory requirements.

MMC retained the services of Action Technical Services, Inc. to perform the work. Action Technical Services excavated soils from an area adjacent to the transformer pad on the west side of Building 5A measuring approximately 20 feet long by 3 feet wide by 3 feet deep to achieve a cleanup level of less than 10 mg/kg PCBs in the remaining soils. Confirmatory samples were collected from the bottom and side walls of the excavation and

William Daigle, P.E.  
October 27, 1995  
Page 4

analyzed for PCBs. The confirmatory analytical data indicate no detectable PCBs (less than 1 mg/kg- "ppm") (Exhibit E); in addition, PCBs were not detected in a sample of the excavated soils (less than 0.1 ug/g- "ppm") (Exhibit C). The soil was disposed as nonregulated material.

In addition, Action Technical Services cleaned fourteen interior floor drains and a floor drain sump to achieve a cleanup level of 10 ug/100 cm<sup>2</sup> PCBs in each drain and the sump. The confirmatory analytical data indicate that the cleanup levels were achieved (Exhibit E). The wastes generated as a result of the floor drain and sump cleaning included sediment from the bottom of the sump (described as "sludge" in the analytical report, Exhibit C: 76 ug/g PCBs as received; 613 ug/g dry weight basis and also in the manifest (Exhibit D)) and water from the sump and the wash water from the jet cleaning of the floor drains and sump (described as "liquid" in the analytical report, Exhibit C: 45.5 ug/l). A manifest was prepared for the sediment and water and they were transported off-site for disposal as hazardous waste (Exhibit D).

The Phase II Report also focused on two former underground storage tank locations, one in the northwest and one in the southeast building corner, and groundwater sampling. MMC did not perform any remedial work in connection with these two issues because no environmental concerns relating to them had been identified either by GE during the site assessment work (see the Phase I and Phase II reports prepared by Wehran, copies of which were provided to the EPA/DEC with our September 23, 1994 CERCLA 104(e) response and also under cover of our letter, dated August 30, 1995) or requested by DE & JD based on the C&H Engineers Phase II Report.

The C&H Engineers Phase II Report and the documents related to the soil removal and sump cleaning had not been provided in response to the DEC/EPA CERCLA § 104(e) Request for Information, dated July 1994 (as supplemented, December, 1994) concerning Onondaga Lake, because it was not in existence at the time MMC submitted its responses. Although Attorney Davies contends that there is an ongoing obligation to supplement our Section 104(e) responses, we have not found a provision in Section 104(e) of CERCLA that imposes such a continuing obligation.

Nonetheless, we are submitting the enclosed information, because we agree that the DEC and EPA retain the right to request additional information. However, the enclosed information does not support the view that our position on the scope of required investigation at the site is incorrect. A sample of the soil removed from the area adjacent to the Building 5A transformer pad did not contain detectable PCBs. The floor drain sump and associated floor drain clean out work involved only the interior of Building 5A and did not suggest that any impacts to the environment had occurred. The sump discharged to the sanitary sewer during the period GE and MMC leased Building 5A. The drawing attached as Exhibit F shows the connection to the sanitary sewer. We believe the sump is still connected to the sanitary

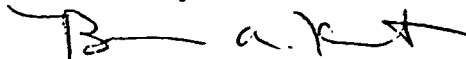
William Daigle, P.E.  
October 27, 1995  
Page 5

sewer, but this will need to be confirmed with the current owner. We continue to believe that the environmental issues at the site are limited to VOCs.

This information had not been brought to DEC's attention earlier because the project did not involve any adverse environmental impact. However, the information would have been provided in response to DEC's September 27, 1995 letter regarding the scope of work for the IRM and RI/FS. In that letter, DEC requested soil sampling around the transformer pads at Buildings 5 and 5A identified in the Wehran Phase I and II site assessments. MMC would have provided the attached information as part of the requested investigatory work at the transformer pads. After DEC has had an opportunity to review this information, we are prepared to discuss additional RI requirements, if any, related to the transformer pad at Building 5A.

We would like an opportunity to meet to discuss this matter further and we will contact you to arrange a convenient date. We want to assure DEC that it has been, and will continue to be, the Company's position to be forthcoming in our discussions on environmental issues. We sincerely regret that, as a result of this recent exchange, DEC may conclude that the Company actually maintains a contrary view. In the interim, please contact me if you have any questions with respect to the information provided herein.

Sincerely,



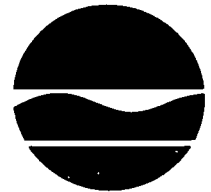
Brian A. Kent, Manager  
Environment, Safety & Health

**Attachments**

cc: Robert K. Davies, Esq. (w/attachments)  
Sandra Lee Fenske, Esq. (w/attachments)  
Virginia C. Robbins, Esq. (w/attachments)

bcc: Mr. Daniel R. Spoor (w/o attachments)

New York State Department of Environmental Conservation  
Division of Environmental Enforcement  
50 Wolf Road  
Room 400  
Albany, New York 12233-5550



Michael D. Zagata  
Commissioner

Telephone: (518) 457-7821  
Fax: (518) 457-7819

AUG 17 1995

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. Brian A. Kent  
Environmental Manager  
Lockheed-Martin  
Syracuse Operations Dept.  
P.O. Box 4840  
Syracuse, N.Y. 13221-4840

RE: EPA/DEC Joint Request for Information

Dear Mr. Kent:

This correspondence responds to your company's reply to the joint request for information from EPA and the Department dated July 20, 1994. As you may recall, the Department contacted you by letter, dated December 8, 1994, seeking supplemental information in order to complete the July 20, 1994 joint request. After review, our consultant has identified several data gaps in Lockheed-Martin's (LM's) replies, as set out below. Pursuant to the July 20th request, and the underlying authority provided by CERCLA and the ECL, EPA and the Department ask that the requested information be provided within 30 days of your receipt of this correspondence.

1. Pursuant to LM's response to question 6 of the joint request, EPA and the Department ask that LM please provide summaries of site-specific operations for the Court Street, Farrell Road and Tarbell Road (Court Street-Building 8) facilities. In addition, Please provide a breakdown of hazardous waste disposal quantities by originating facility, if possible.

2. Regarding LM's response to question 9, please provide analytical data for the Tarbell Road facility. Also, please provide documentation of any spills that occurred at LM's facilities prior to 1989, of which you have knowledge.




3. In regard to LM's response to question 10 of the joint request, please indicate how the sludges or residues generated by the treatment processes at the Electronics Park facility were disposed.


4. EPA and the Department have reviewed the "Due Diligence Summary Report" submitted as an attachment to LM's second mailing. Please provide EPA and the Department with copies of the documents listed on the attached Table 1.

5. Lastly, please provide any information and copies or summaries of, Discharge Monitoring Reports for any discharges of process wastewater and stormwater for the Electronics Park, Farrell Road, Court Street and Tarbell Road facilities.

We hope that EPA's and the Department's receipt of this supplemental information will complete your company's response. We will continue to review your company's submittal and therefore must reserve our rights to ask for further supplemental information at a later date if it becomes necessary. Please contact Mr. Little if you have any questions.

Sincerely Yours,

  
William G. Little  
Associate Attorney  
Division of Environmental  
Enforcement

  
George A. Shanahan  
Assistant Regional Counsel  
United States Environmental  
Protection Agency, Region II

**Table 1**  
**Due Diligence Summary Report Documents**

<u>Record #</u>	<u>Date</u>	<u>Title</u>	<u>Building</u>
<u>All Facilities</u>			
1041	1990	Special Assessments on Generation,	All Bldgs
1042	1991	Treatment or Disposal of Hazardous	All Bldgs
1043	1992	Waste in New York State	All Bldgs
<u>Electronics Park</u>			
156	1977	Report of Chemical Use	All Bldgs
159	1980	Industrial Chemical Survey	All Bldgs
170	1982	Waste Sludge Analysis Report	8
192	1991	Industrial Waste Questionnaire	All Bldgs
734	1990	Excursion Report Outfall #1	All Bldgs
1044	1991	Generator Hazardous Waste Report	All Bldgs
1048	1990	Generator Hazardous Waste Report	All Bldgs
1051	1989	Generator Hazardous Waste Report	All Bldgs
<u>Farrell Road</u>			
46	1992	Phase II Investigation - Plant 2	2
107	1992	Addendum to Phase II Investigation	2
408	1985	Sanitary Sewer Sampling Data	2
446	1990-92	Notification of Noncompliance w/OCDDS Permit	All Bldgs
502	1991	Site Activities Final Report & Data	All Bldgs
544	1989	Copper Discharge Exceedences	2
556	1992	Phase II Investigation - Plant 1	1
570	1983	Industrial Waste Questionnaire	All Bldgs
571	1991	Hazardous Waste Notification	All Bldgs
633	1990	Stream & Creek Sediment Contamination	Grounds
856	1990	Special Assessment on Generation/Treatment/ Disposal of NYS Hazardous Waste	All Bldgs
1045	1991	Generator Hazardous Waste Report	All Bldgs
1049	1990	Generator Hazardous Waste Report	All Bldgs
1052	1989	Generator Hazardous Waste Report	All Bldgs
1087	1992	Additional Groundwater Sampling Data	All Bldgs
<u>Court Street</u>			
7	1991	Site Investigations & Response Actions	ABC
9	1991	Groundwater Investigation Report - Phase III Ceramic Lead Investigation	ABC
14	1991	Hazardous Waste Report - Phase III Ceramic Lead Investigation	ABC

470	1991	Annual Report - OCDDS Permit	All Bldgs
473	1990	Annual Report - OCDDS Permit	All Bldgs
478	1991	Bldg 8 Discharge not listed in permit	8
485	1990	Industrial Waste Questionnaire	All Bldgs
488	1991	Notification re: Hazardous Waste to be disposed of	All Bldgs
490	1983	Industrial Waste Questionnaire and Report	All Bldgs
494	1987	Industrial Waste Questionnaire and Report	All Bldgs
496	1984	Identification of Facilities re: metal finishing	All Bldgs
735	1992	Letter re: testing, violation of discharge permit	All Bldgs
1046	1991	Generator Hazardous Waste Report	All Bldgs
1047	1991	Generator Hazardous Waste Report	8
1050	1990	Generator Hazardous Waste Report	All Bldgs
1053	1989	Generator Hazardous Waste Report	All Bldgs

bcc: Commissioner Zagata  
G. Shanahan, EPAREG2  
H. King, EPAREG2  
D. Hesler  
A. Peterson